## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

	§	
WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	
DEVELOPMENT,	§	Civil Action No. 6:20-00952-ADA
	§	Civil Action No. 6:20-00953-ADA
Plaintiff,	§	Civil Action No. 6:20-00956-ADA
	§	
v.	§	
	§	JURY TRIAL DEMANDED
ONEPLUS TECHNOLOGY (SHENZHEN)	§	
CO., LTD.,	§	
	§	
Defendant.	§	

## DECLARATION OF JOSHUA A. WHITEHILL IN SUPPORT OF PLAINTIFF'S RESPONSIVE CLAIM CONSTRUCTION BRIEF (GROUP I PATENTS)

I, Joshua A. Whitehill, declare as follows:

- 1. I am a Special Counsel with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development ("Plaintiff") in this matter. I make this declaration in support of Plaintiff's Responsive Claim Construction Brief (Group I Patents) ("Plaintiffs' Brief").
- 2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.
- 3. The exhibits to this Declaration begin with Exhibit H. Defendant included Exhibits A-F with its Opening Claim Construction Brief (Dkt. 32), and Exhibit G (Declaration of Dr. Cooklev) accompanies Plaintiff's Brief.
- 4. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt from Institute of Electrical and Electronics Engineers, The IEEE Standard Dictionary of Electrical and Electronic Terms (6th ed. 1997).

5. Attached hereto as **Exhibit I** is a true and correct copy of an excerpt from George McDaniel, International Business Machines, IBM Dictionary of Computing (McGraw-Hill, 10<sup>th</sup> ed. 2004).

6. Attached hereto as **Exhibit J** is a true and correct copy of an excerpt from American Heritage, Dictionary of Computer and Internet Words (Houghlin Mifflin Co. 2001).

7. Attached hereto as **Exhibit K** is a true and correct copy of an excerpt from OXFORD UNIVERSITY PRESS, DICTIONARY OF COMPUTING (6<sup>th</sup> ed. 2008).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 14th day of September, 2021, in Bloomfield, New Jersey.

/s/ Joshua A. Whitehill
Joshua A. Whitehill